

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Jaimenys Taveras, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Jaimenys Taveras, and I am the stepdaughter of Manuel De Jesus Molina, who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration to demonstrate I am the functional equivalent of Manuel’s daughter.

2. Manuel came into my life in 1992 when he started dating my mother.¹ I was 9 years old at the time. In 1995, my mother, my two younger sisters, Jaimelin and Jaimercedes, and I moved into a 3-bedroom apartment with Manuel at 3407 DeKalb Avenue in the Bronx, and we became a family. We lived there together from 1995 until September 11, 2001, when he was killed in the terrorist attacks. Also during much of that time (for 5 years starting in 1997), Manuel’s cousin, Maria Perez lived with us there too.

3. Manuel supported our family and took care of us. Because my mom was disabled, Manuel was not only our family’s sole breadwinner, but he also took on the lead role in our family’s home life and in raising me and my younger sisters. Manuel contributed extensively to common household chores, grocery shopping, cleaning, and childcare. Manuel was our primary caregiver. Manuel helped us with our homework, attended our school events and medical

¹ They were legally married on April 9, 2000 in the Dominican Republic.

appointments, cooked small meals for us, played with us at home, bought us birthday and Christmas presents, took us to the park, out to eat at our favorite restaurant, and to visit his mother's and sister's apartments in Manhattan almost every weekend. He took us on vacations during the summer to see his extended family in his hometown in the Dominican Republic and the dozens of roosters they kept. Manuel did everything a father would be expected to do for his children, in addition to most things a mother would traditionally be expected to do since my mom is disabled. *See* photos attached as Exhibit 1. Manuel's death created a large void that could never be filled. He was a true family man.

4. I remember having family dinners with Manuel and spending time together on the weekends as a family. He was supportive, funny, attentive, and always tried to hide the ugly parts of the world from me and my younger sisters. Manuel was our provider and protector. He was a home body and was a safe and loving presence in our home. He brought stability to us. A stability we never knew until he came into our lives. He was the first person to give me \$20, which was significant because my biological father never supported us at all, was an alcoholic and was physically and emotionally abusive. Manuel was also the first to take me to a movie—the Lion King. He would regularly take me out to dinner at McDonalds since he knew it was my favorite and told me I could order whatever I wanted. When I was older, we also would regularly commute home from our jobs in Manhattan on the 4 train and walk home together. He loved boxing, Bachata music, working out, dominoes, and his collection of birds. I still have the hat Manuel gave me that belonged to him. I never would have guessed that would be the last memento I would have of him.

5. There is no doubt Manuel was my father. He gave me advice (and, of course, discipline) like any loving father. The discipline was firm but kind. I remember I used to cut

school, and he would take me aside and tell me about the importance of school and getting an education. He held me out as his daughter, and I considered him my father. It meant so much to me that Manuel was always present and made sure I felt important. I felt seen and heard by him, He was quiet, sweet, respectful, calm, and brought a peace that was desperately needed since we previously dealt with an alcoholic and physically and emotionally abusive father. I didn't fully appreciate what a calming, steady presence he was in my life until after he gone. I miss him so much and still tear up thinking about him and what we lost.

6. In contrast, I have no real relationship with my biological father, who was an alcoholic and physically and emotionally abusive. He moved to the Dominican Republic when I was around 12 years old and never came back to visit me. At most he would call 2-3 times a year or no calls at all when I was growing up and only for a 2-minute conversation. He did not provide emotional or financial support to me and my younger sisters, or act at all like a father.

7. 9/11 ripped our family apart. The night before, something didn't feel right. I told my parents. I was worried something would happen to them. Manuel made one of his usual jokes and reassured me that everything would be fine. When I woke up on September 11, 2001, I never imagined I would never see Manuel again. I had hopes he was a missing person, and we would be able to find him. On 9/11, I walked several miles to Manhattan from the Bronx because buses and trains weren't heading to the areas near the World Trade Center. I visited several hospitals asking if he was a patient there and scrolling over lists of patients that had checked in from the attacks. I did not want to believe Manuel left this world so suddenly and unexpectedly, but I eventually had to accept the terrible truth that he was really gone. I was devastated by Manuel's tragic death. I was robbed of a father and friend. After Manuel's death, I sought counseling from the parish priest at St. Brenda Roman Catholic Church to help cope with his death. I feel

Manuel's loss every day and share fond memories of him. *See* my Legacy tribute post attached as Exhibit 2.

8. My two younger sisters and I received non-economic dependency awards from the original September 11th Victims Compensation Fund of 2001 on account of our status as functional equivalents of dependent children, and Manuel listed us as his dependents on his 1997, 1998, 1999, and 2001 tax returns.

9. Manuel and I had a very close relationship akin to a father and daughter and we considered each other to be father and daughter in every way. Accordingly, I should be deemed the functional equivalent of Manuel's daughter.

Executed on: May 19th, 2024

Name (Signature): Jaimenys Taveras

Name (Print): Jaimenys Taveras

EXHIBIT 1









